

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

Cause No. 19-CR-3113-JB

**ROBERT PADILLA, et al.,**

Defendants.

**JOINT MOTION FOR EXTENSION OF TIME**  
**TO SUBMIT EXPERT NOTICES AND REPORTS**

The United States, by and through its undersigned counsel, and Defendants, by and through their undersigned counsel, hereby move the Court for an extension of time to file expert notices and reports.

In support of this motion the undersigned state:

1. The Jury Trial of this matter is scheduled to begin on October 18, 2021.
2. Pursuant to the Scheduling Order filed in this case, Doc. 288, the Government's expert witness notices and reports were due by February 12, 2021, and the Defendant's expert witness notices and reports are due by March 12, 2021.
3. Offers to resolve the case have been extended to defendants. However, due to scheduling difficulties, the defendants have not had sufficient time to review and respond to said offers. Therefore, the United States would like to give defendants additional time to review and/or accept the offers.
4. Counsel for the Defendants set forth below join in this request:

- a. Joe M. Romero on behalf of Defendant Robert Padilla;
- b. Megan Mitsunaga behalf of Defendant Janaya Atencio;
- c. Ahmad Assed on behalf of Rose Ann Romero;
- d. Ryan J. Villa on behalf of Tomas Sanchez;
- e. Gregory M. Acton on behalf of Ashley Romero;
- f. Michael Alarid, Jr. on behalf of Marcos Ruiz;
- g. Diego R. Esquibel on behalf of Defendant Luis Sanchez;
- h. Phillip G. Sapien on behalf of Defendant Sergio Valdez;
- i. Wayne Baker on behalf of Jonathan Vigil;
- j. Michael V. Davis on behalf of Defendant Genevieve Atencio; and
- k. Thomas M. Clark on behalf of Robert Hockman.

**WHEREFORE**, the parties respectfully request that the Court grant an extension of time for submitting the Government's expert notices and reports until February 22, 2021; grant an extension of time for submitting the Defendants' expert notices and reports until March 22, 2021; and grant an extension of time for filing objections to expert notices until April 12, 2021.

Respectfully submitted,

FRED J. FEDERICI  
Acting United States Attorney

/s/ electronically filed February 19, 2021  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 19, 2021, I filed the foregoing document electronically through the CM/ECF system. Pursuant to the CM/ECF Administrative Procedures Manual, §§ 1(a), 7(b)(2), such filing is the equivalent of service on parties of record.

/s/  
Robert I. Goldaris  
Assistant United States Attorney